## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

TRAXXAS LP	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 2:14-cv-1005
V.	§	
	§	
HOBBYKING CORP. d/b/a	§	
HOBBYKING and HOBBYKING.COM,	§	JURY TRIAL DEMANDED
and ABC FULFILLMENT SERVICES	§	
LLC d/b/a HOBBYKING USA LLC and	§	
HOBBYKING.COM.	§	
	§	
Defendants.	§	

## **JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiff Traxxas LP ("Traxxas") and Defendants HobbyKing Corp. d/b/a HobbyKing and HobbyKing.com and ABC Fulfillment Services LLC f/k/a HobbyKing USA LLC and HobbyKing.com ("Defendants" or "HobbyKing"), pursuant to Fed. R. Civ. P. 41(a)(2) and (c), hereby move for an order dismissing all claims in this action WITH PREJUDICE, subject to the terms of an agreement entitled "SETTLEMENT AGREEMENT AND GENERAL RELEASE" and dated December 17, 2015, with each party to bear its own costs, expenses and attorneys' fees. The Court retains jurisdiction over this case for purposes of enforcing the Settlement Agreement.

Dated: January 7, 2016 Respectfully Submitted,

By: /s/ Paul V. Storm
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**CERTIFICATE OF SERVICE** 

The undersigned certifies that the foregoing document was filed electronically in

compliance with Local Rule CV-5(a). As such, this response was served on all counsel who are

deemed to have consented to electronic service. Local Rule CV-5(a)(3)(V). Pursuant to Fed. R.

Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have

consented to electronic service were served with a true and correct copy of the foregoing by

email, on this the 7th day January, 2016.

/s/ William E. Davis, III

William E. Davis, III

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